

REMARKS

Amendments

Amendments to the Claims

Applicant has amended the independent claims to more particularly define the terms in the claims. No new matter has been added as a result of these amendments because they are supported, *intra alia*, at paragraph 22 of the specification.

Rejections

Rejections under 35 U.S.C. § 103

Claims 1-13

Claims 1-13 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Costello, *How an XML Instance Document References an XML Schema* (January 2000), in view of Villard, *An XML-based Multimedia Document Processing Model for Content Adaptation* (September 2000), further in view of Hunter, *Multimedia Content Description Interface* (May 2000).

Costello describes how an XML instance document indicates which of its parts conform to what XML schema.

Villard discloses transforming an XML document into a time-based multimedia version of the document. Villard identifies two types of document transformations: generic and specific. The generic transformation transforms any valid XML document into a multimedia document. The specific transformation transforms only one particular XML document multimedia document.

Hunter discloses the use of XML schemas to define MPEG-7 data description language (DDL) elements.

The Examiner asserts that Villard's specific transformation maps between a general application namespace to a specific application namespace. Applicant respectfully submits that the word "namespace" is a term of art, and that Villard does not actually disclose that either the generic or the specific transformation maps between namespaces as the term is defined in the art. Accordingly, it appears that the Examiner is relying on the principal of inherency in asserting that Villard teaches mapping between

namespaces as claimed by Applicant. Applicant respectfully reminds the Examiner that the Examiner must provide some reasoning that the allegedly inherent characteristic is necessarily present in the prior art to establish a proper case of inherency. Inherency cannot be established by probabilities or possibilities. The mere fact that the allegedly inherent characteristic may be present is insufficient to support a rejection using the principal of inherency. [MPEP: 2112 IV] Thus, the mere fact that Villard transforms an XML document into a multimedia document is insufficient evidence that Villard transforms the document by mapping between different namespaces as claimed by Applicant.

Nonetheless, in the interest of advancing prosecution, Applicant has amended the independent claims to define a specific application domain as supporting fewer multimedia description elements than the general application domain. Because none of the cited references teach or suggest a specific application domain as claimed, the combination of the references cannot be properly interpreted as doing so.

Therefore, the combination of Costello, Villard and Hunter cannot render obvious Applicant's invention as claimed in claims 1-13, and Applicant respectfully requests the withdrawal of the rejection of the claims under 35 U.S.C. § 103(a) over the combination.

Claims 14-28

Claims 14-28 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the combination of Costello, Hunter and Villard.

As set forth above, none of the three references teach or suggest a specific application domain as claimed by Applicant. Therefore, the combination of Costello, Hunter and Villard cannot render obvious Applicant's invention as claimed in claims 14-28, and Applicant respectfully requests the withdrawal of the rejection of the claims under 35 U.S.C. § 103(a) over the combination.

SUMMARY

Claims 1-28 are currently pending. In view of the foregoing amendments and remarks, Applicant respectfully submits that the pending claims are in condition for

allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Sue Holloway at (408) 720-8300 x3476.

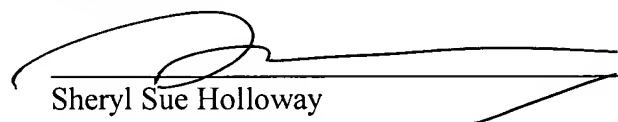
Deposit Account Authorization

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

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